

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 1:17-mc-00151-LPS

SIEMENS ENERGY, INC.,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A.,

Defendant.

C.A. No. 22-mc-00347- LPS

**SIEMENS ENERGY, INC.'S MOTION TO SUBSTITUTE
XYQ US, LLC FOR SIEMENS ENERGY, INC. AS REAL-PARTY-IN-INTEREST**

Siemens Energy, Inc., by its counsel, Reed Smith LLP, and through the accompanying Declaration of Justin M. Forcier, dated December 19, 2025, together with the exhibits annexed thereto, moves this Court for an order, pursuant to Federal Rule of Civil Procedure 25(c), substituting XYQ US, LLC for Siemens Energy, Inc. as the real-party-in-interest in the above captioned actions; amending the caption of Case No., 22-mc-00347 to reflect XYQ US, LLC as the plaintiff and real-party-in-interest; and granting such other and further relief as the Court deems just and proper. SEI has conferred with Petróleos de Venezuela, S.A. and the *Crystallex* Sale Process Parties regarding this motion, and they have not taken a position.

Dated: December 19, 2025

Respectfully submitted,

REED SMITH LLP

/s/ Justin M. Forcier

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